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*Attorneys for Irving H. Picard, Esq., Trustee
for the Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities LLC
and Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

Adv. Pro. No. 08-01789 (BRL)

SIPA Liquidation

(Substantively Consolidated)

**NOTICE OF PRESENTMENT OF TRUSTEE'S MOTION FOR AN ORDER
APPROVING THE RETENTION OF LA TANZI, SPAULDING &
LANDRETH, P.C. AS SPECIAL COUNSEL NUNC PRO TUNC AS OF JUNE 7, 2012**

PLEASE TAKE NOTICE, that upon the motion of Irving H. Picard, Esq. ("Trustee"), as trustee for the substantively consolidated liquidation of Bernard L. Madoff Investment Securities LLC and the estate of Bernard L. Madoff, for entry of an order approving the retention

of La Tanzi, Spaulding & Landreth, P.C., as special counsel to the Trustee, *nunc pro tunc*, as of June 25, 2012, the undersigned will present the attached Motion and proposed Order to the Honorable Burton R. Lifland, United States Bankruptcy Judge, for signature and entry on **July 27, 2012 at 12:00 noon.**

PLEASE TAKE FURTHER NOTICE, that objections, if any, to the Motion (“Objections”), shall (i) be in writing; (ii) conform to the Federal Rules of Bankruptcy Procedure and any Local Bankruptcy Rules, General Orders, or other applicable guidelines; (iii) specify the name of the objecting party and state with specificity the basis of any objection(s) and the specific ground(s) therefore; (iv) be filed in accordance with the electronic filing procedures for the United States Bankruptcy Court for the Southern District of New York, together with proof of service, and a courtesy copy delivered to the Chambers of the Honorable Burton R. Lifland, One Bowling Green, New York, New York 10004; and (v) be served upon (a) Baker & Hostetler LLP, counsel to the Trustee, 45 Rockefeller Plaza, New York, New York 10111, Attn: Marc E. Hirschfield, Esq., and (b) the Securities Investor Protection Corporation, 805 Fifteenth Street, NW, Suite 800, Washington, DC 20005, Attn: Kevin H. Bell, Esq., so as to be received no later than **11:00 a.m. on July 27, 2012.**

PLEASE TAKE FURTHER NOTICE, that in the event any Objections are timely filed and served, a hearing may be held before the Honorable Burton R. Lifland, United States Bankruptcy Judge, at a date and time to be scheduled by the Court, upon such additional notice as the Court may direct. The moving and objecting parties are required to attend the hearing, and failure to attend in person or by counsel may result in relief being granted or denied upon default.

PLEASE TAKE FURTHER NOTICE, that, unless Objections are timely filed and served, the proposed Order may be signed without a hearing.

Dated: New York, New York
July 19, 2012

Respectfully submitted,

/s/ Marc E. Hirschfield

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